

**UNITED STATES BANKRUPTCY COURT  
FOR EASTERN DISTRICT OF PENNSYLVANIA 3<sup>rd</sup> CIRCUIT**

Milton Thomas Sr.

V

The City Of Philadelphia &  
The School District of Philadelphia,  
William Miller, U.S. Bankruptcy Trustee

Case no. 04-10175  
Adversary No.19-00043

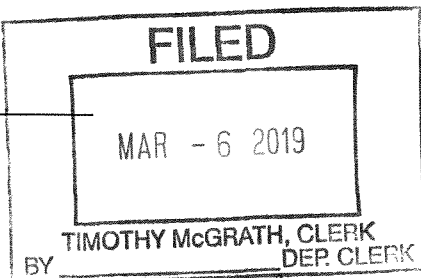
**Motion to Hold the Defendants, the City of Philadelphia and the  
School District of Philadelphia In Contempt for Violation of § 524 of the  
Bankruptcy Code**

On July 21, 2015 the City violated the discharge injunction after they sold at sheriff sale the subject property 1620 So. 58<sup>th</sup> st and listed the subject property 1618 So. 58<sup>th</sup> st. for Sheriff sale for debt that had been discharged.

Wherefore the pl respectfully requests that this court hold the defendants in contempt of § 524 and award the plaintiff damages;

1. The value of the subject property, 1620 So. 58<sup>th</sup> st as stated in the City's Assessment Value and Certificate of Value.
2. The loss of the \$ 650.00 monthly rental income from the date of the sale of the subject property 1620 So 58<sup>th</sup> st to this present day.
3. To cease and desist any collection of fees , penalties or interest incurred during and there out of the violation of the discharge injunction.
4. The release of any collection fees, penalties, or interest incurred on 1618 So 58<sup>th</sup> st while during and there out of the violation of the discharge injunction.
5. The reinstatement of any City License suspended due to the plaintiff's unwillingness to pay any debt that was discharged through the bankruptcy.
6. Mental Frustration.

*Milton Thomas*  
Milton Thomas  
140 W Spencer ave.  
Philadelphia, PA 19120  
267-401-0978



*March 6, 2019*  
Date